

LINCOLN PAPER AND TISSUE CO., INC.)	DEPARTMENTAL
PENOBSCOT COUNTY)	FINDING OF FACT AND ORDER
LINCOLN, MAINE)	AIR EMISSIONS LICENSE
A-177-77-2-M)	NEW SOURCE REVIEW #2

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Sections 344, 587 and 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Lincoln Paper and Tissue (LPT)
PART 70 LICENSE NUMBER	A-177-70-A-I
LICENSE TYPE	Chapter 115 Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	Lincoln, Maine
PART 70 LICENSE ISSUANCE DATE	October 22, 2002
NSR AMENDMENT ISSUANCE DATE	April 5, 2007
PART 70 LICENSE EXPIRATION DATE	October 22, 2007

Lincoln Paper and Tissue Company, Inc. (LPT) operates a fully integrated pulp and paper mill in Lincoln, Maine. This minor revision addresses the installation of a new scrubber to replace the existing bleach plant scrubber for High Volume Low Concentration (HVLC) controls as well as residual bleach plant emissions.

B. Application Classification

LPT's application was submitted pursuant to the minor revision procedures in Chapter 115. The application for LPT does not violate any applicable federal or state requirements and does not increase emissions of any pollutant. Therefore, this modification is determined to be a minor revision for New Source Review under Chapter 115 and has been processed as such.

II. DESCRIPTION OF MINOR REVISION

A. Bleach Plant Scrubber Replacement

LPT plans to install a new scrubber which will be an integral part of meeting the High Volume Low Concentration (HVLC) collection and treatment system required per 40 CFR Part 63, Subpart S and Chapter 124, TRS regulation. LPT operates an existing bleach plant scrubber to meet the requirements of Chapter 122 of the Departments' regulations. LPT has demonstrated that the scrubber is not required for compliance with federal bleach plant MACT requirements. The scrubber is currently operated to comply with the ClO_2 limit of Chapter 122, a state-only requirement.

With the installation of the HVLC system in April 2007, Cl_2 and ClO_2 emissions from the bleach plant will actually become the scrubbing media for TRS collected in the HVLC system. The HVLC system will incorporate a new atomizing spray white liquor scrubber (i.e., the new Cl_2/ClO_2 scrubber) just before the MeOH scrubber (i.e., the existing Cl_2/ClO_2 scrubber) to remove any residual ClO_2 not consumed in the scrubbing of TRS. The new white liquor scrubber will also be used to treat the Cl_2/ClO_2 emissions to Chapter 122 levels during limited periods when the brownstock washers are down and the bleach plant and/or ClO_2 plant is running. The new white liquor scrubber will provide the same level of Cl_2 and ClO_2 Control efficiency as the existing scrubber and is considered Best Available Control Technology (BACT).

The new white liquor scrubber is not a recirculating flow scrubber so the installed flow meter will be recording white liquor flow to the scrubber; not recirculation flow. Additionally, as the scrubbing media will be white liquor (no longer a recirculation flow) with a continuous pH greater than 12.5, LPT has requested that the Chapter 122 monitoring requirement of pH/ORP be deleted. Currently, Condition 21 (F) of LPT's initial Part 70 Air Emissions License, A-177-70-A-I states the following:

**LINCOLN PAPER AND TISSUE CO., INC.)
PENOBSCOT COUNTY)
LINCOLN, MAINE)
A-177-77-2-M**

**DEPARTMENTAL
FINDING OF FACT AND ORDER
AIR EMISSIONS LICENSE
3 NEW SOURCE REVIEW #2**

- 21(F) LPP shall install, calibrate, record and maintain parameter monitors to determine scrubber recycle flow, ORP and pH. LPP shall record this data once per shift and keep records for six years. Bleach Plant parameter monitors shall be calibrated and in use and data recorded once per shift for at least 90% of the source uptime during each quarter. The facility shall monitor and record the following for the Bleach Plant Scrubber System and the ClO₂ Generation Plant Scrubber System:

Parameter for each scrubber	Recording Frequency	Demonstrated With
Recycle flow	once a shift	flow meter
Fluid ORP/pH	once a shift	probe

The recording of pH is no longer necessary since LPT will use white liquor instead of a recirculation flow to the scrubber. The white liquor will always have a pH consistently greater than 12.5; therefore, the need to measure pH is no longer warranted. This license condition will be updated in the upcoming Chapter 140 Administrative Revision.

ORDER

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards, or increment standards either alone or in conjunction with emissions from other sources.

The Department hereby grants this minor revision, A-177-77-2-M, subject to the conditions found in Air Emission License A-177-70-A-I and subsequent amendments, in addition to the following conditions:

LINCOLN PAPER AND TISSUE CO., INC.)
PENOBSCOT COUNTY)
LINCOLN, MAINE)
A-177-77-2-M 4

DEPARTMENTAL
FINDING OF FACT AND ORDER
AIR EMISSIONS LICENSE
NEW SOURCE REVIEW #2

(1) LPT is subject to the following New Source Review Chapter 115 condition.

- LPT shall install a new scrubber to be used as part of its HVLC compliance strategy. The white liquor scrubber system shall have the white liquor flow measured by a flow meter.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 6, 2007

Date of application acceptance: March 12, 2007

Date filed with Board of Environmental Protection: _____

This Order prepared by Edwin Cousins, Bureau of Air Quality